

1 THAD A. DAVIS (SBN 220503)
thad.davis@ropesgray.com
2 ROCKY C. TSAI (SBN 221452)
rocky.tsai@ropesgray.com
3 ROPES & GRAY LLP
Three Embarcadero Center, Ste 300
4 San Francisco, California 94111-4006
Tel: (415) 315- 6300
5 Fax: (415) 315-6350

6 HARVEY J. WOLKOFF (Subject to admission *pro hac vice*)
harvey.wolkoff@ropesgray.com
7 MARK P. SZPAK
mark.szpak@ropesgray.com
8 LARA A. ORAVEC
lara.oravec@ropesgray.com
9 ROPES & GRAY LLP
Prudential Tower, 800 Boylston Street
10 Boston, MA 02199-3600
Tel: (617) 951-7606
11 Fax: (617) 235-0215

12 Attorneys for Defendants
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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION
17

18 GREGORY NEWMAN III, AARON WESTER,
ERIC BELL, DAVID MCELROY, TONY
19 GREER, RAYMOND GROSCH, AMANDA
LIGHTAUL, and NICHOLAS MICHAEL,
20 individually and on behalf of all others similarly
situated,

21 Plaintiffs,
22

23 vs.
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25 SONY COMPUTER ENTERTAINMENT
AMERICA LLC and SONY NETWORK
ENTERTAINMENT INTERNATIONAL LLC,
26

27 Defendants,
28

Case No. 3:11-cv-02434-JCS

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: Hon. Joseph C. Spero

1 WHEREAS, defendants Sony Computer Entertainment America LLC (“SCEA”) and
2 Sony Network Entertainment International LLC (“SNEI”), as well as certain related entities
3 (collectively, the “Sony Defendants”), have been named as defendants in at least twenty-five (25)
4 putative class action lawsuits within this District, to date;

5 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
6 least nineteen (19) putative class action lawsuits pending outside this District, to date;

7 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
8 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed
9 to date, and as to which other responses, including Sony Defendants’ response, are due by June 2,
10 2011.

11 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
12 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
13 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
14 JPML;

15 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
16 by and through their respective counsel, hereby stipulate as follows:

17 The deadline for the defendants to respond to the Complaint in the above-captioned action
18 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
19 litigation centralizing the above-captioned action with other matters, or if centralization is denied
20 by the JPML, then 30 days from the date of such order denying centralization.

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2 Either party may seek ex parte relief from this stipulated Order for good cause shown,
3 including, but not limited to, Defendants' filing of a responsive pleading in a related case.

4
5 Dated: May 25, 2011

MICHAEL A. CADDELL
CYNTHIA B. CHAPMAN
CORY S. FEIN
CADDELL & CHAPMAN

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8 By: /s/ Cory S. Fein /s/ [as authorized]
Cory S. Fein

9
10 Attorneys for Plaintiffs
GREGORY NEWMAN, III *et al.*

11
12 Dated: May 25, 2011

HARVEY WOLKOFF
THAD A. DAVIS
ROCKY C. TSAI
ROPES & GRAY LLP

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14
15
16 By: /s/ Rocky C. Tsai /s/
Rocky C. Tsai

17 Attorneys for Defendants
18 SONY COMPUTER
19 ENTERTAINMENT AMERICA LLC;
INTERNATIONAL LLC

20 **[PROPOSED] ORDER**

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22
23 Dated: May 26, 2011

24 By: [Signature] U.S. District Judge

